

# Exhibit E

To the Declaration of J. Michael Keyes in Support of  
Defendant's Opposition to Plaintiff's Motion to Exclude  
and/or Strike Defendant's Expert Witness and Report

**From:** Jonathan Alejandrino <jonathan@copycatlegal.com>  
**Sent:** Monday, August 25, 2025 9:01 AM  
**To:** Hansen, Connor; Tia Kelly; Lauren Hausman  
**Cc:** Keyes, Mike; Duran, Nancy; Ganir, Kayla  
**Subject:** RE: Grecco v. TikTok - Expert

EXTERNAL FROM OUTSIDE DORSEY. BE CAUTIOUS OF LINKS AND ATTACHMENTS.

Connor,

TikTok disclosed its initial expert two weeks late, which left an insufficient amount of time to prepare to depose Mr. Duski, given that his report is more than 60 pages and Summary Judgment motions were due within a week of the untimely disclosure. Moreover, Plaintiff was then forced to write a separate motion to address the untimeliness.

Considering that expert discovery closes this Friday, and Plaintiff has moved to strike Mr. Duski/his report, there is no way to accommodate the deposition in our schedule this week.

This is not a matter of *choosing* not to depose Mr. Duski. This is a matter of your client disregarding court deadlines. It is prejudicial to Plaintiff to incur costs to depose a witness where there is a pending motion to strike.

Regards,



**Jonathan Alejandrino, Esq.**  
Attorney

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**From:** Hansen.Connor@dorsey.com <Hansen.Connor@dorsey.com>  
**Sent:** Monday, August 25, 2025 11:24 AM  
**To:** Jonathan Alejandrino <jonathan@copycatlegal.com>; Tia Kelly <tia@copycatlegal.com>; Lauren Hausman <lauren@copycatlegal.com>  
**Cc:** keyes.mike@dorsey.com; duran.nancy@dorsey.com; Ganir.Kayla@dorsey.com; Hansen.Connor@dorsey.com  
**Subject:** RE: Grecco v. TikTok - Expert

Hi Jonathan,

To confirm, do you want to schedule the deposition on an alternative date or are you choosing not to depose Mr. Duski at this time?

Thanks,  
Connor

**Connor J. Hansen**

IP Litigation Associate

Pronouns: He/Him/His

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**From:** Jonathan Alejandrino <[jonathan@copycatlegal.com](mailto:jonathan@copycatlegal.com)>**Sent:** Monday, August 25, 2025 10:21 AM**To:** Hansen, Connor <[Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com)>; Tia Kelly <[tia@copycatlegal.com](mailto:tia@copycatlegal.com)>; Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>**Cc:** Keyes, Mike <[keyes.mike@dorsey.com](mailto:keyes.mike@dorsey.com)>; Duran, Nancy <[duran.nancy@dorsey.com](mailto:duran.nancy@dorsey.com)>; Ganir, Kayla <[Ganir.Kayla@dorsey.com](mailto:Ganir.Kayla@dorsey.com)>**Subject:** RE: Grecco v. TikTok - Expert

EXTERNAL FROM OUTSIDE DORSEY. BE CAUTIOUS OF LINKS AND ATTACHMENTS.

Hello Connor,

Unfortunately, neither my nor Lauren's schedule is able to accommodate the single date you've provided.

Additionally, as you are aware we have opposed this expert on August 11, August 15, and formally moved to strike him and his report on August 20.

Regards,

**Jonathan Alejandrino, Esq.**  
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**From:** [Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com) <[Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com)>**Sent:** Saturday, August 23, 2025 11:47 AM**To:** Jonathan Alejandrino <[jonathan@copycatlegal.com](mailto:jonathan@copycatlegal.com)>; Tia Kelly <[tia@copycatlegal.com](mailto:tia@copycatlegal.com)>; Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>**Cc:** [keyes.mike@dorsey.com](mailto:keyes.mike@dorsey.com); [duran.nancy@dorsey.com](mailto:duran.nancy@dorsey.com); [Ganir.Kayla@dorsey.com](mailto:Ganir.Kayla@dorsey.com); [Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com)**Subject:** Re: Grecco v. TikTok - Expert

Hi Lauren and Jonathan,

Please let us know if you are planning to depose Mr. Duski. He has been holding Aug. 26 for the deposition and needs to know for his schedule.

Thanks,  
Connor

Sent from my iPhone

On Aug 15, 2025, at 5:22 PM, Hansen, Connor <[Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com)> wrote:

Counsel,

Attached and served are Defendant's Expert Disclosures as well as the Rebuttal Expert Report of David R. Duski. If you would like to depose Mr. Duski, he can be available on Tuesday August 26. Please let us know if that date works for you.

Thanks,  
Connor

**Connor J. Hansen**

**IP Litigation Associate**

Pronouns: He/Him/His

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